



POLICE DEPARTMENT

Deputy Chief Richard Napolitano
NYPD Communications Division
350 Marconi Street
Bronx, NY 10461

July 9, 2020

Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte*, PS Docket No. 07-114

Dear Chairman Pai:

I am writing to ask you to reconsider the current requirements on 9-1-1 location accuracy chosen in the draft Report and Order that is on the Commission's July 16 Open Meeting agenda. The draft order cites a letter I submitted for the record when the Commission was contemplating revision of the wireless 9-1-1 location accuracy rules in 2019. My letter explained why dispatchable location is truly the most accurate and dependable location information emergency communications centers (ECCs) need. The draft on the agenda however, includes ambiguous language that would fail to provide useful locations.

Dispatchable location will save lives. In New York and other cities like ours, a densely woven network of residential and commercial structures requires not only a building number to locate a caller in need, but when possible, the floor and apartment number as well. With tens, even hundreds of apartments/suites in a single building, without the additional possibility of a floor number and apartment, the vertical estimate provided by HAE (Height Above Ellipsoid) would be inadequate and needlessly delay an otherwise timely response.

The public safety community's ongoing response to the coronavirus pandemic has further highlighted the importance and value of dispatchable location. When a call is placed to 9-1-1 and the location is not attainable, for example because the caller is a child or is having severe difficulty breathing, 9-1-1 first responders cannot rely on an HAE-based location provided by the carrier for the needed urgent response. In cases such as these, the HAE technology may cause loss of life.

I believe the choice of dispatchable location must be coupled with clear benchmarks. Simply put, clearly delineated percentages of required performance worked into the Order now would proactively provide a roadmap for carriers to provide this needed dispatchable location in the future. ECCs like ours could then use these standards to conduct our own field testing if desired, and work with the Commission and any carrier that fell short without wasting time debating at the expense of our citizens.

For example, the horizontal accuracy rules are clear that in 2020 nationwide wireless carriers must provide 50m horizontal accuracy or dispatchable location for 70% of all wireless 9-1-1 calls. That's a benchmark I can use to assess whether the location information delivered in our jurisdiction is compliant. The vertical accuracy rules should take a similar approach and establish minimum percentages of indoor wireless calls that must be delivered with dispatchable location. Should a standard such as this not be implemented, I believe that ultimately, our residents will suffer because 9-1-1 will not be provided what it needs to be truly effective.

The carriers can and should provide thorough location information, and the Commission's regulations should require them to do so. In this time of crisis, thank you for considering my perspective.

A handwritten signature in dark ink, appearing to read "Rich Napolitano". The signature is fluid and cursive, with the first name "Rich" and last name "Napolitano" clearly distinguishable.

Richard Napolitano
Commanding Officer
NYPD Communications Division